

August 31, 2005

530/223/2585

FAX 530/223/1145

70467

Ms. Katie Bowman  
California Regional Water Quality Control Board  
Central Valley Region  
415 Knollcrest Drive, Suite 100  
Redding, CA 96002

 VESTRA**Re: Closure Work Plan Extension Request**

Dear Ms. Bowman:

VESTRA Resources, Inc. received the June 24, 2005 letter from the Regional Water Quality Control Board (RWQCB) requesting a Closure Work Plan for pond closure at the Winnemucca Trading Company Limited Inc. (Winnemucca), site in Anderson. Winnemucca appreciates that the ponds are regulated under National Pollution Discharge Elimination System (NPDES) Permit No. CA0004065 and Cleanup and Abatement Order R5-2004-0717, however, recent sampling results show that the ponds do not pose a threat to human health or water quality.

Winnemucca is currently evaluating potential future uses for the entire paper mill property, including the ponds and surrounding parcels. Winnemucca is also evaluating an application for assistance grants for Brownfield reuse planning for this site. Brownfield reclamation is a primary objective of the current administration. As you can expect, planning and grant applications take considerable time.

It is not possible to develop a detailed closure plan for the pond area without also addressing long-term use of the land surrounding the ponds and stormwater management of the mill site. Winnemucca is working with planners and financiers to develop alternative use scenarios for the site to include in Brownfield grant applications. They anticipate that the planning and application process will take over a year to complete. VESTRA will provide an update on the planning process in the annual groundwater report due to the RWQCB on February 28, 2006.

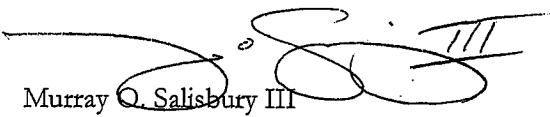
Until the completion of re-use development plans, Winnemucca commits to continue to operate the stormwater collection system from the mill site and the ponds concurrently, to ensure that no threat to water quality occurs from either site. Given the low threat associated with ponds, and the lengthy period of time that the ponds remained in their current situation prior to Winnemucca's purchase of the site, Winnemucca respectfully requests an approval for delay from the RWQCB of the submittal of a formal pond closure plan until the pond closure can be included in the long term re-use plans for the site. In the interim period, Winnemucca will continue to monitor the ponds per the Waste Discharge Requirements and will operate the pond and stormwater collection facility for the mill site as designed.

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Please call me at (530) 223-2585 or Mike Sommers at (800) 832-8834 if you have questions regarding this request. Winnemucca would be happy to meet with you to discuss the request and our plans for the site if that would assist the RWQCB in its deliberation of the request.

Sincerely,

**VESTRA Resources, Inc.**  
**Environmental Services Division**



Murray Q. Salisbury III  
Project Manager

cc: Mike Sommers/Winnemucca Trading Company Inc.  
Jack Reese/Reese, Smalley, Wiseman & Schweitzer